

FILED

November 04, 2021

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

BY: Erika Gonzalez
DEPUTY

**UNITED STATES OF AMERICA,
Plaintiff,**

v.

**SHEYENNE DANESSA MONTOYA,
Defendant.**

SEALED

EP-21-M-2386-RFC

**United States' Motion to Detain Defendant Without
Bond and Motion for Continuance**

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

1. The Defendant was arrested for a violation of Title 18, United States Code, Section 1201, *Kidnapping*. The offense is a crime of violence.
2. The Defendant is a danger to the community with cartel involvement and dangerous criminal activity.
3. There are no conditions or combination of conditions which will reasonably assure the safety of the community should the Defendant be released on bond.
4. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant at future court settings.

The Government would further move the Court for a three-day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

ASHLEY C. HOFF
UNITED STATES ATTORNEY

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